

REMARKS

Claims 1-14 are pending in the current application. Applicants thank the Examiner for the indication that claims 5, 8-10, and 13 include allowable subject matter. However, in light of the following remarks, Applicants respectfully submit that all pending claims are in condition for allowance.

Claims 1-14 stand rejected under 35 U.S.C. §112, second paragraph, for failing to distinctly claim the subject matter considered to be the invention.

Applicants respectfully disagree with the Examiner's objection to the term "high" in claim 1 due to the specification's lack of providing "a standard for ascertaining the requisite degree." The specification discloses examples of what one skilled in the art would consider a "low" value (*See* specification ¶ [0005]-[0006], 0.2 W/mk and 1 W/mk) and examples of what would be considered a "high" value (*See* specification ¶ [0047], 6000 W/mk). Therefore, it is respectfully submitted that one of ordinary skill in the art could understand the meaning of the term "high" of claim 1 in light of the disclosure in the specification. Accordingly, Applicants respectfully submit that the §112 rejection of claims 1-14 be withdrawn.

Claims 1, 6, 12, and 14 stand rejected under 35 U.S.C. §102(e) as being anticipated by Leal et al. (U.S. Patent No. 6,838,776)("Leal").

Claims 1 recites the limitation of "a packaging means, which surrounds the electronic circuit unit (102) *and which is electrically insulating.*"

In contrast, Leal discloses an encapsulant layer 24, which may be "any type of electrically conductive material that can be molded, such as, for example, thermoset epoxy with metallic filler or thermoplastic with metallic filler." (*See* Leal, col.3, ll. 17-20). Leal continues to explain

that the metallic filler may be any suitable electrically conductive material and can be conductive nano-particles. (*Id.*, col. 3, ll. 20-23). Therefore, it is evident that the Leal disclosure does not anticipate the claimed invention because Leal discloses an electrically conductive encapsulant layer whereas the claimed invention is electrically insulating. Thus, it is respectfully submitted that claim 1 and its dependent claims 6, 12, and 14 are allowable over Leal.

Claims 2-4 and 7 stand rejected under 35 U.S.C. §103(a) as being obvious with respect to Stoner et al. (U.S. Patent No. 6,965,199). Claim 11 stand rejected under 35 U.S.C. §103(a) as being obvious with respect to Leal in view of Tobita (U.S. Patent No. 6,652,958).

Applicants respectfully submit that neither Stoner nor Tobita cure the previously mentioned deficiencies of Leal and that Leal, Stoner, and Tobita, taken alone or in any combination, fail to teach “a packaging mens, which surrounds the electronic circuit unit (102) *and which is electrically insulating*” as recited in claim 1. Therefore, claims 2-4, 7, and 11 are also allowable for at least the same reasons previously mentioned with regard to claim 1.

In light of the foregoing, Applicants respectfully submit that all of the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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